

Jeffrey Willis, Esq.  
Nevada Bar No. 4797  
Holly E. Cheong, Esq.  
Nevada Bar No. 11936  
SNELL & WILMER L.L.P.  
3883 Howard Hughes Parkway, Suite 1100  
Las Vegas, NV 89169  
Telephone: (702) 784-5200  
Facsimile: (702) 784-5252  
Email: jwillis@swlaw.com  
hcheong@swlaw.com

*Attorneys for Plaintiff/Counter-Defendant HSBC Bank,  
USA, National Association, as Trustee for Mortgageit  
Securities Corp. Mortgage Loan Trust, Series 2007-1,  
Mortgage Pass-Through Certificates*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

HSBC BANK, USA, NATIONAL  
ASSOCIATION, AS TRUSTEE FOR  
MORTGAGEIT SECURITIES CORP.  
MORTGAGE LOAN TRUST, SERIES  
2007-1, MORTGAGE PASS-THROUGH  
CERTIFICATES, a national banking  
association;

Plaintiff,

vs.

SFR INVESTMENTS POOL 1, LLC, a  
Nevada limited liability company; VIA  
VALENCIA/VIA VENTURA  
HOMEOWNERS ASSOCIATION, a Nevada  
non-profit corporation; ABSOLUTE  
COLLECTION SERVICES, LLC, a Nevada  
limited liability company;

Defendants.

SFR INVESTMENTS POOL 1, LLC, a  
Nevada limited liability company,

Counterclaimant/Cross-Claimant,

vs.

Case No.: 2:17-cv-01512-APG-GWF

**STIPULATION AND ORDER TO ALLOW  
HSBC BANK, USA TO AMEND ITS  
COMPLAINT**

1 HSBC BANK, USA, NATIONAL  
 2 ASSOCIATION, AS TRUSTEE FOR  
 3 MORTGAGEIT SECURITIES CORP.  
 4 MORTGAGE LOAN TRUST, SERIES 2007-  
 5 1, MORTGAGE PASS-THROUGH  
 6 CERTIFICATES, national banking  
 7 association, CITIMORTGAGE, INC.;  
 8 MAGELLAN A. AQUINO, an individual,

Counter-Defendant/Cross-Defendants.

8 Plaintiff/Counter-Defendant HSBC Bank, USA, National Association, as Trustee for  
 9 Mortgageit Securities Corp. Mortgage Loan Trust, Series 2007-1, Mortgage Pass-Through  
 10 Certificates (“HSBC Bank”), Defendant/Counterclaimant/Cross-Claimant SFR Investments Pool  
 11 1, LLC, Defendant Via Valencia/Via Ventura Homeowners Association, and Defendant Absolute  
 12 Collection Services, LLC (collectively, the “Parties”), by and through their respective counsel,  
 13 and hereby stipulate as follows:

14 1. Pursuant to FRCP 15(a)(2), the Parties agree that HSBC Bank may file HSBC  
 15 Bank’s First Amended Complaint (“Amended Pleading”), a copy of which is attached hereto in  
 16 clean and redline format as Exhibit A.

17 2. The Parties’ agreement herein shall not be construed in any way to indicate that  
 18 the Parties agree with or are stipulating to any of the allegations set forth in HSBC Bank’s  
 19 Amended Pleading.

20 3. The Parties against whom claims are asserted will have twenty (20) business days  
 21 to file a response to HSBC Bank’s Amended Pleading.

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

IT IS SO STIPULATED.

DATED this 28<sup>th</sup> day of November, 2018

By: /s/ Holly E. Cheong

Holly E. Cheong, Esq.  
Nevada Bar No. 11936  
Snell & Wilmer, L.L.P.  
3883 Howard Hughes Parkway, Suite  
1100  
Las Vegas, NV 89169  
hcheong@swlaw.com  
*Attorneys for Plaintiff/Counter-  
Defendant HSBC Bank, USA, National  
Association, as Trustee for Mortgageit  
Securities Corp. Mortgage Loan Trust,  
Series 2007-1, Mortgage Pass-Through  
Certificates*

By: /s/ Jacqueline A. Gilbert

Jacqueline A. Gilbert, Esq.  
Nevada Bar No. 10593  
Kim Gilbert Ebron  
7625 Dean Martin Drive, Suite 110  
Las Vegas, NV 89139  
jackie@kgelegal.com  
*Attorneys for Defendant/  
Counterclaimant/Cross-Claimant  
SFR Investments Pool 1, LLC*

By: /s/ Shane D. Cox

Shane D. Cox, Esq.  
Nevada Bar No. 13852  
Absolute Collection Services, LLC  
7485 West Azure Drive, Suite 129  
Las Vegas, NV 89128  
shane@absolute-collection.com  
*Attorneys for Defendant Absolute  
Collection Services, LLC*

By: /s/ Ashlie L. Surur

Ashlie L. Surur, Esq.  
Nevada Bar No. 11290  
Hall, Jaffe & Clayton, L.L.P.  
7425 Peak Drive  
Las Vegas, NV 89128  
asurur@lawhjc.com  
*Attorneys for Defendant Via  
Valencia/Via Ventura Homeowners  
Association*

**ORDER**

IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

DATED: 11-29-2018